



AMERICAN OSTEOPATHIC ASSOCIATION

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October 26, 1999

VIA FAX & MESSENGER

Center for Substance Abuse Treatment
Proposed Rule Public Hearing – Docket No. 98N-0671
Office of Pharmacological and Alternative Therapies
Rockwall II
5515 Security Lane
Rockville, MD 20857

1095 1 2-4 0113

Re: Written Notice of Participation – Nov. 1, 1999 Proposed Rule Public Hearing

The American Osteopathic Association represents the nation's 43,500 osteopathic physicians. As president of the AOA, I appreciate the opportunity to have a representative of the AOA provide comments at your public hearing.

Karen Sees, D.O., will represent our association at your hearing. She will require fifteen minutes to make her presentation. The AOA's presentation will concern the proposal which indicates if adopted only accreditation organizations that apply under this proposed rule would be eligible to accredit Outpatient Treatment Programs related to Methadone treatment.

The proposal would limit eligibility to those applicants who demonstrate that they will be able to accredit at least 50 OTPs per year. The AOA opposes the use of an arbitrary number to determine the quality of accreditation services without any clear evidence of the validity of such criteria. The AOA believes a more appropriate approach would be performance criteria that measure the quality of accreditation.

The AOA recommends that the performance-based criteria already in place be used for determining the viability and acceptability of accreditation organizations, not simply the number of facilities that they are capable of surveying. While the AOA supports the Secretary's desire to assure that accreditation organizations are of high caliber, we believe that the quality of a program should be based on performance, not on an arbitrarily set number of facilities that it accredits per year.

The following is the information you requested on our representative: Karen Sees, D.O., 12201 Meadow Creek Court, Potomac, Maryland. Telephone (301) 765-1069. FAX (301) 765-0958.

Sincerely,

Carol Monaco
Assistant Director of Regulatory Affairs

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